

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: PRO TRUCKING, INC.
DEBTOR**

**CASE NO. 18-12428-SDM
CHAPTER 11**

EXPEDITED MOTION FOR CONTINUANCE

Commercial Credit Group Inc. (“CCG”) files this Expedited Motion for Continuance, respectfully requesting that this Court continue the hearing on Colonial Funding Network, Inc.’s (“Colonial Funding”) [64] Motion to Prohibit Debtor’s Use of Non-Estate Property and to Compel Turnover, which is currently set for November 27, 2018 at 10:00 a.m. In support, CCG shows the following:

1. On September 11, 2018, Colonial Funding filed its motion, asking this Court to, among other things, order the Debtor to turnover certain accounts receivable.
2. Because CCG has a vested right in the Debtor’s accounts receivable, CCG timely [72] objected to Colonial Funding’s motion.
3. This Court set the hearing on Colonial Funding’s motion for October 23, 2018 (*See* [65] Notice of Hearing), but the hearing was reset for November 27, 2018 (*See* [87] Notice of Hearing).
4. Because CCG has a vested interest in the Debtor’s accounts receivable, it is necessary for CCG to attend the hearing to protect its rights and interests.
5. But CCG’s counsel, John Thomson, is scheduled to appear before the Supreme Court of South Carolina the date of the hearing. And CCG’s other counsel of record, Tim Anzenberger, is scheduled to appear before the Hinds County Justice Court the date of the hearing for trial, which trial has already been continued once at the request of Mr. Anzenberger.

6. CCG therefore respectfully asks this Court to grant this Motion and continue the hearing, so that CCG may appear and protect its rights and interests in the Debtor's accounts receivable.

For these reasons, CCG respectfully asks this Court to grant this motion and continue the hearing.

Dated: November 16, 2018.

COMMERCIAL CREDIT GROUP INC.

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CERTIFICATE OF SERVICE

Service provided via Notice of Electronic Filing (NEF) through ECF:

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Office of the U.S. Trustee.

Dated: November 16, 2018.

/s/ Timothy J. Anzenberger
Of Counsel